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12 UNITED STATES DISTRICT COURT  
13 EASTERN DISTRICT OF CALIFORNIA

14 ARTHUR R. VALDEZ,

15 Plaintiff,

16 v.

17 MARTIN O'MALLEY,  
18 Commissioner of Social Security,

19 Defendant.

No. 2:24-cv-00907-DMC

STIPULATED MOTION AND ORDER FOR  
AN EXTENSION OF TIME TO RESPOND TO  
PLAINTIFF'S MOTION FOR SUMMARY  
JUDGMENT

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21 IT IS HEREBY STIPULATED, by and between the parties through their respective  
22 counsel of record, with the Court's approval, that Defendant's time for responding to Plaintiff's  
23 Motion for Summary Judgment be extended thirty (30) days from September 16, 2024, to  
24 October 16, 2024. This is Defendant's first request for an extension. Counsel for Plaintiff has no  
25 objection to Defendant's request for an extension.

26 Good cause exists for this request. Defendant respectfully requests this additional time  
27 because Counsel for Defendant has and will be unable to devote the time required to complete its  
28

1 response. Counsel has multiple merit briefs currently due in district court cases within the next  
2 week. Given competing workload requirements an extension until October 16, 2024, will provide  
3 the opportunity for the undersigned Counsel for Defendant to prioritize completing the response  
4 to Plaintiff's Motion for Summary Judgment. The undersigned Counsel apologizes to the Court  
5 and Plaintiff's counsel for any inconvenience caused by this request and delay. All other dates in  
6 the Court's Scheduling Order shall be extended accordingly.

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8 Respectfully submitted,

9 PHILLIP A. TALBERT  
10 United States Attorney

11 DATE: September 5, 2024

12 By: s/ Oscar Gonzalez de Llano  
13 OSCAR GONZALEZ DE LLANO  
14 Special Assistant United States Attorney  
15 Attorneys for Defendant

16  
17 Respectfully submitted,

18 Law Offices of Lawrence D. Rohlifing, Inc., CPC

19 DATE: September 5, 2024

20 By: s/ Monica Perales \*  
21 Monica Perales  
22 (\*as authorized by email)  
23 Attorney for Plaintiff  
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ORDER

Pursuant to Defendant's Motion, IT IS SO ORDERED that Defendant shall have an extension, up to and including October 16, 2024, to respond to Plaintiff's Motion for Summary Judgment.

Dated: September 10, 2024

A handwritten signature in dark ink, appearing to read 'Dennis M. Cota', written over a horizontal line.

DENNIS M. COTA  
UNITED STATES MAGISTRATE JUDGE